

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JENNIFER LYNNE FAITH

Criminal No. 3:21-CR-137-B

GOVERNMENT'S SENTENCING MEMORANDUM

On January 27, 2022, the parties filed a Plea Agreement (*Document 35*) wherein the defendant agreed to plead guilty to the offense alleged in Count One of the superseding indictment charging her with violating 18 U.S.C. § 1958 (Use of Interstate Commerce Facilities in the Commission of Murder-For-Hire). The defendant entered her guilty plea on February 7, 2022. Sentencing is scheduled for May 26, 2022. The government asks that the Court accept the terms of the plea agreement and further requests that the Court sentence the defendant to life in prison. The government submits the following in support of the request:

Background

On October 9, 2020, at approximately 7:33 a.m., the defendant and her husband, James Faith, Jr. (Jamie) exited the front door of their residence in the Oak Cliff area of Dallas, Texas to walk their dog, Maggie. A Ring security camera recorded the last few seconds of Jamie's life as he and the defendant exited their residence (*See Attachment A*). Approximately one minute into their walk, Darrin Ruben Lopez approached Jamie from behind and shot him seven times with a .45 caliber handgun. Jamie was shot three

times in the head, three times in the torso and once in the groin. A neighbor's Ring security camera recorded audio of the ambush and the defendant's reaction to the murder immediately after it occurred. Jamie was pronounced deceased at the scene (*See Attachment B*). As the shooter fled, another neighbor used a cell phone to take a photograph of the shooter's vehicle (*See Attachment C*). The truck used by the shooter had a distinctive "T" decal on the driver's side back window.

Jamie and Jennifer Faith

On October 8, 2005, the defendant met Jamie on a blind date, and they began dating shortly thereafter. Prior to meeting Jamie, the defendant received her master's degree in speech pathology in 1997 from Hampton University in Hampton, Virginia. That same year, the defendant's only child, Amber was born. In approximately 1998, the defendant moved from Virginia to Tucson, Arizona. After moving to Arizona, the defendant divorced her daughter's biological father and married her second husband. Less than a year later, the defendant again filed for divorce. From December 2012 until approximately March 2018, the defendant worked as a Regional Director of Rehabilitation Services at an inpatient rehabilitation hospital.

Jamie Faith was born in Madison, Wisconsin in 1971. In 1995, Jamie received a Bachelor of Science degree from the University of Wisconsin --- Whitewater. In January 2000, Jamie began working for Phelps Dodge in Phoenix, Arizona as a web engineer. Jamie met and began dating the defendant in 2005 while living and working in Phoenix. In 2011, Jamie accepted a job with US Airways in Tucson, Arizona as a senior manager.

The following year, he married the defendant. In approximately 2014, US Airways was acquired by American Airlines. In 2017, Jamie accepted a promotion at American Airlines and he, the defendant and Amber moved from Arizona to Dallas, Texas. From 2014 until the time of his murder, Jamie worked as an executive for American Airlines.

In March 2016, Jamie adopted Amber and she took his last name. From 2005 until the date of his death, Jamie was the only father figure that Amber Faith had in her life. Jamie provided physical, emotional, and financial support to Amber as though she was his biological daughter (*See Attachment D*). Jamie, the defendant, and Amber traveled on multiple vacations together including a ten-day trip to Europe in 2019 and routinely took part in weekly family game nights with friends and family.

Jamie helped pay for Amber Faith's college education and assisted her financially after she graduated. Amber described her relationship with her father as follows: "My dad came into my life when I was about seven years old. Right out of the gate we were pretty much joined from the hip. We had a really close relationship. Our family, we were all in each other's business. We just loved spending time together and it was a very loving home. My dad loved and adored me, and I always knew that."

By all accounts, Jamie was a kind, loving and devoted husband to the defendant (*See Attachment E*). At his funeral in October 2020, the defendant described her relationship with Jamie as an "amazing, perfect life." She stated that she and Jamie "prided themselves on being the couple everyone hated because we were too perfect, and we loved that we had the relationship that everyone else wanted." In multiple televised

media interviews following her husband's murder, the defendant described Jamie as "amazingly caring" and "very kind." In February 2020, the defendant created and purchased a hardcover book on LoveBook.com and gave it to Jamie for Valentine's Day. In the book, the defendant wrote to Jamie "You're the sweetest, most caring partner I could ever ask for" and "I love how safe you make me feel, Jamie." (*See Attachment F*).

Darrin Ruben Lopez

Approximately one month after presenting the LoveBook to Jamie, the defendant set in motion a scheme that ultimately resulted in her husband's murder. In March 2020, the defendant reconnected on social media with Darrin Ruben Lopez, her former high school boyfriend who was living in Tennessee. On March 17, 2020, the defendant sent the first of numerous emails to Lopez from her personal email account (jenniferurlaub@gmail.com) (*See Attachment G*). Beginning on March 17, 2020, and continuing until the week of Jamie's murder, the defendant and Lopez communicated with each other through email, text messages and cell phone calls sometimes hundreds of times per day.

In multiple communications, both Lopez and the defendant expressed their love for one another. Less than one month after reconnecting with Lopez, the defendant mailed Lopez a handwritten letter that read in part: "Darrin --- In you I have everything I've ever wanted --- a man with so much strength and feeling; such integrity and feeling in your heart. The more I reconnect with you, the deeper I appreciate, love and cherish what you are and what we have. With you, I have everything – the perfect partner, best

friend, and sweetest love I've ever known. I am so glad life led us back together." Lopez sent emails to the defendant expressing his love for her and encouraged her to "keep dreaming of our life together. Keep planning our lives together."

On April 20, 2020, the defendant sent a text message to one of her friends living in Arizona. In the text message she told her friend that "I am pretty much having a full-blown emotional affair" with my former high school boyfriend who lives in Tennessee. The defendant told her friend that Lopez had a "5-year plan" for them to be together. When asked how she was feeling, the defendant responded, "I feel like a fucking 13-year-old." The defendant stated that she was in constant contact with Lopez "all day every day."¹ Cell phone records reflect that between May 2020 and January 11, 2021, the defendant's cell phone was in contact with Lopez's cell phone over 122,000 times --- an average of almost 500 times per day.

On October 27, 2021, the government met with Lopez and his attorney at the Dallas County Jail and Lopez agreed to cooperate and answer questions. Lopez advised that he and the defendant dated in high school and had discussed getting married after graduating in 1990 (*See Attachment H*). In high school, Lopez referred to the defendant as "his Angel." The defendant's cell phone number was saved in Lopez's cell phone

¹ In a text message exchange with the same friend on May 2, 2020, the defendant told her friend that Lopez was "already a) planning on me being [in Tennessee] and b) you coming to visit me." In June 2020, the friend texted the defendant and asked, "you still talking to your guy." The defendant responded, "still talking to Darrin and we are still going strong." On August 6, 2020, the friend texted the defendant again and asked, "you still talking to that guy?" This time the defendant lied to her friend and said she was no longer communicating with Lopez ("I put the brakes on him. I just couldn't do it to [Jamie]"). Cell phone records reflect that the defendant was in constant contact with Lopez throughout August 2020 up until the day before Jamie was murdered.

contacts under the name “Angel.”

In December 1994, Lopez enlisted in the Army. Lopez was a Special Forces Medical Sergeant and dog handler that served multiple tours in Iraq (*See Attachment I*). On September 8, 2005, while in Iraq, Lopez sustained a traumatic brain injury (TBI) following the detonation of a roadside bomb. Nineteen soldiers in his unit were killed in the blast. In May 2015, Lopez retired from the Army and began receiving full disability benefits as a result of his TBI and being diagnosed with post-traumatic stress disorder. Lopez lived in Cumberland Furnace, Tennessee with his wife and three daughters after retiring from the Army. In 2018, Lopez and his wife separated, and she left the home. Lopez advised that in December 2019, he was depressed, going through a very difficult divorce, was in danger of losing his home and “was in a very dark place” in his life.

Lopez advised the government that in January 2020, in an effort to turn his life around, he began reaching out on social media to reconnect with old friends from his past. Lopez used LinkedIn, Twitter and finally email to contact the defendant. Lopez stated that his intent was to reach out to the defendant and let her know that the memories that they shared together had helped him through some very difficult times while he was in the military. It was not his intent to reunite with her romantically or breakup her family.

Lopez stated that shortly after reconnecting with the defendant, he discussed his disability with her in detail. When asked how his medical condition impacted him, Lopez told the government that he suffers from severe headaches, balance issues, short term

memory loss, impulse control, and loss of temper. Lopez stated that in March 2020, the defendant told him that she was “an expert” in treating traumatic brain injuries, especially in soldiers, as a result of her background and training in speech pathology. In response, Lopez sent his medical records to the defendant so that she could review them. After she reviewed the records, the defendant told Lopez his condition was “pretty bad” but that “she had seen worse cases.”

Lopez told the government that shortly after reconnecting with the defendant, she began to tell him that her husband “Jamie” was physically and sexually abusing her. Lopez stated that in early April 2020, he began receiving text messages from the defendant’s cell phone from someone identifying himself as the defendant’s husband, “Jamie.” The text messages he received detailed acts of extreme physical and sexual violence. Those acts included restraining the defendant, locking the defendant in a closet, forcibly holding her head under water as she performed a sex act until she lost consciousness, cutting off her hair and watching numerous men violently sexually assault her. Lopez was told by “Jamie” in a text message that the abuse was a form of punishment in response to Lopez and the defendant reconnecting online.

Fake Gmail Accounts

On April 9, 2020, the defendant used the Google Chrome browser on her desktop computer to create a fake Gmail account in the name of her husband (jamiefaith511@gmail.com).² The defendant used the fake account to pose as her

² Jamie Faith’s real Gmail account was jamesfaithjr@gmail.com. When Amber Faith was shown the email address

husband and trick Darrin Lopez into believing that Jamie Faith was physically and sexually abusing her when in fact he was not.

It was not enough for the defendant to simply create the fake email account. She went to great lengths to ensure that Lopez believed the fake account really belonged to her husband. For example, two days after the defendant created jamiefaith511@gmail.com, she used the fake account to send a link detailing a vegan diet to her own personal email account (jenniferurlaub@gmail.com). The subject line in the email read “Starting Tomorrow.” The defendant then used her email account to forward the email written on the fake account to Darrin Lopez with a message that read “Nice....” so that it appeared as though the original email message containing the link to the diet had originated from her husband’s email account. (*See Attachment K*).

During his interview with the government, Lopez advised that in April 2020 he began receiving emails from jamiefaith511@gmail.com to his personal email account. Lopez had never spoken to and did not know Jamie Faith. The emails purported to be from “Jamie Faith” and described acts of physical and sexual violence. On occasion, the emails included photographs of injuries and extreme sexual abuse Lopez believed was being inflicted upon the defendant. (*See Attachment J*).³ Lopez stated that he continued

jamiefaith511@gmail.com she advised the government that the email account was “fake,” that she had never seen it before and that her father, for security reasons, would never create an email account using his real date of birth (May 11th). Jamie Faith’s employer, American Airlines advised the government that jamiefaith511@gmail.com was not an email account that Jamie Faith listed in any of his employment documents.

³ In an email sent to Lopez dated May 9, 2020, at 11:21 p.m., photographs were attached that depicted an injury to the defendant’s neck and bruising on her body. A message in the email read: “Good stuff. Enjoy knowing you cannot do a fucking thing about it.” Following the defendant’s arrest, FBI computer forensic examiners found the photographs of the injuries on the defendant’s desk top hard drive in a file. A review of the photograph’s metadata

to receive emails from jamiefaith511@gmail.com into June 2020. Lopez advised the government that on multiple occasions he told the defendant he was going to contact the police and report the abuse that he believed was occurring.⁴ On each occasion, the defendant persuaded Lopez not to do so because getting the police involved could harm the relationship that her daughter Amber had with her father. The defendant told Lopez that she did not have a relationship with her father, and she did not want that for her daughter. The defendant told Lopez that if the police were called, she would not cooperate and would deny that any abuse was occurring. Lopez stated that the defendant suggested that he instead reach out to one of her closest friends, R.S. and seek his help.

On May 13, 2020, the defendant used the Google Chrome browser on her desktop computer to create a second fake Gmail account in the name of her friend R.S. (sxxxxxx225@gmail.com).⁵ The defendant used the fake email account to assume the identity of R.S. and communicate with Lopez. On May 13, 2020, the defendant provided Lopez with the fake email address sxxxxxx225@gmail.com and suggested that he reach out to R.S. and seek his help. She also forwarded to Lopez pictures of injuries she said she had sustained the night before as a result of her husband's abuse. One of the images

revealed that the photographs were taken in September 2012, in Phoenix, Arizona. The photographs were not injuries from physical abuse but were the result of a car wreck the defendant was involved in eight years earlier (*See Attachment J*).

⁴ In an email dated May 11, 2020, sent to the fake "Jamie Faith" account, Lopez warned "Jamie" that he would "call the cops" and "report a domestic disturbance" at their home if he did not stop the abuse.

⁵ In a text message to friends, the defendant described R.S. as "my work husband of 15+ years and also my rock and confidant." R.S. advised the government that he does not know and has never communicated with Darrin Lopez through emails. R.S. stated that sxxxxxx225@gmail.com is not an email account he has ever seen or used and that the account was created in his name without his knowledge or consent. R.S. advised he was not made aware of any abuse in the Faith household and that Jamie would never physically abuse his wife or anyone else.

she provided included a photograph of a bloody lip (*See Attachment L*).

On May 13, 2020, the same day the defendant created and shared the fake Gmail account in the name of R.S., Lopez used his personal email account to send an email message to the person he believed was R.S. but was in fact the defendant posing as her friend (*See Attachment M*). In the email, Lopez attached the photograph of the bloody lip that the defendant had sent to him claiming it was an injury she sustained after being “slapped” by her husband. Lopez explained who he was and asked for R.S.’s help (“I am writing to you to ask for your help. Jamie, Jenn’s husband is physically and sexually abusing her”). The photograph attached to the email and the defendant’s claim to Lopez that she was being abused by Jamie were fake. The image of the bloody lip that the defendant sent to Lopez was not a photograph of the defendant but was a stock image of a bloody lip that the defendant had downloaded and saved to her Google Chrome account from Shutterstock.com and forwarded to Lopez (*See Attachment N*).

Beginning May 13, 2020, and continuing through August 2020, the defendant, while posing as R.S., regularly communicated with Lopez using the fake Gmail account. For example, on May 21, 2020, Lopez used his personal email account to send an email to the person he believed to be R.S., but was in reality the defendant posing as R.S. In the email Lopez wrote: “I still feel [Jamie] is very fucked up in the head. I know I won’t feel better about her situation until she is out of the house away from him or she lets me put a bullet in Jamie’s head.” The defendant, posing as R.S. responded “thanks for the update. I am also very concerned and if it were up to me, I would tell you to go for it with your

idea – lol; I'll give you an alibi.” (*See Attachment O*).

On July 26, 2020, the defendant used her personal email account (jenniferurlaub@gmail.com) to send an email to the fake Gmail account she created in the name of R.S. (sxxxxxx225@gmail.com) that read: “Again--- please do NOT tell Darrin about this.” The defendant attached to the email a photograph of an arm that has what appears to be a burn injury. The defendant then assumed the identity of R.S. and used the fake Gmail account in R.S.’s name to forward her original email with the attached photograph of the burn injury to Lopez’s personal email account. Posing as R.S., the defendant wrote the following message: “Darrin, I talked to Jenn – he’s burning her, among other things. I convinced her to send me a pic (see below) just in case we need it. She didn’t want me to tell you so please keep this between us.” (*See Attachment P*).

Lopez said that in August 2020, the defendant contacted him by cell phone and asked him to help kill her husband. Lopez stated that the defendant told him that she could not take the physical and sexual abuse anymore and that she wanted Jamie killed. When Lopez was asked by the government how he felt when he received the text messages and emails from “Jamie” detailing the abuse, Lopez advised that he got extremely angry, sometimes physically sick and had difficulty sleeping. Lopez stated that early on he tried to ignore the messages but was told by “Jamie” in a text message that if he did not respond to the messages or if he went to the police, the abuse would get much worse.

Electronic Tracking

In September 2020, Jamie and the defendant planned to travel to Las Vegas, Nevada and visit Jamie's parents. The defendant and Lopez remained in constant contact in the days leading up to the trip --- exchanging hundreds of texts every day. On September 7, 2020, the defendant used her personal email account to forward the trip's flight itinerary to Lopez (*See Attachment Q*). Prior to departing for Las Vegas on September 17, 2020, the defendant utilized an app on her cell phone that allowed Lopez to use an iPad to electronically track the defendant and Jamie's movements while they were in Las Vegas.⁶ The app also permitted Lopez to track the exact route that the defendant and Jamie took each morning to walk their dog when they were home in Dallas, Texas. Jamie had no knowledge that in the weeks preceding his murder, he was being electronically stalked by Lopez with help from the defendant.

The Murder of Jamie Faith

Lopez advised the government that he departed his home in Cumberland Forrest, Tennessee to travel to Dallas, Texas to kill Jamie on the afternoon of October 8, 2020. Lopez stated that prior to departing Tennessee, he had multiple text and voice

⁶ When the defendant and Jamie Faith arrived in Las Vegas, she sent a text message to Lopez that read "Landed." Lopez responded, "Good" "Decent Flight?" Lopez, in Tennessee, was using the app on his iPad to track the Faith's movements. In a text exchange Lopez told the defendant that he could see her location ("At your hotel I see...."). The defendant responded "In our room. 716." Lopez replied, "I saw you walking in the parking lot...." The defendant then sent a text to Lopez that read "I love you." Lopez replied, "Omg...I love you too. You have no idea how much I love you." "It's hard going more than an hour without texting you." The defendant shared with Lopez that "Jamie is already in bed and falling asleep so I will be able to text." During a subsequent text exchange, the defendant told Lopez "Jamie is being completely normal today. It's weird. I actually started to remember that I used to like him."

communications with the defendant. Cell phone records confirm these contacts. Lopez stated that the defendant told him that the house next door to the Faith's house on S. Waverly Drive was vacant and that Lopez could safely hide in the backyard until the Faiths exited their home to walk the dog. Lopez stated that he and the defendant exchanged a series of text messages creating a fake alibi involving Lopez going on a hunting trip. At approximately 2:00 p.m., Lopez departed his home enroute to Dallas, Texas in his black 2004 Nissan Titan pickup truck with a distinctive "T" (Tennessee) decal in the back window (*See Attachment R*).⁷ He was in possession of the .45 caliber handgun used to kill Jamie Faith (*See Attachment S*), his cell phone (turned off) and his iPad (left on) so that he could track the Faith's movements.

Lopez advised the government that the defendant knew that he was traveling from Tennessee to Dallas, Texas to kill Jamie. Lopez stated that although the plan was for he and the defendant to ultimately be together after Jamie was killed, both knew that would not be possible immediately. In an email Lopez sent to the defendant on March 26, 2020, Lopez told the defendant, "I love you. I know it has been fast for us, but I am already planning my life with you. I know it will be sometime before we can live with each other every day but in the end, I see that is where we will be." In the months leading up to Jamie's murder, the defendant and Lopez texted each other hundreds of times every day. On October 8, 2020, as Lopez was preparing to travel to Dallas to kill Jamie, he and the

⁷ The photograph in Attachment R was taken at a Pilot truck stop in West Memphis, Arkansas on October 8, 2020 as Lopez was traveling to Dallas, Texas.

defendant exchanged one final text message at 1:07 p.m. then all communication between them stopped for a period of approximately twenty-eight hours.

Lopez stated that he arrived in Dallas during the early morning hours of October 9, 2020. After doing what he described as a “recon” mission around the area to determine the quickest route to the highway, he went into the backyard of the house the defendant had identified and waited until the defendant and Jamie left their home to walk their dog. At approximately 2:40 a.m. on the morning of Jamie’s murder, the Faith’s Ring security system was activated and recorded Lopez in the backyard of the vacant house (*See Attachment T*).

At approximately 7:33 a.m., Lopez heard the front door of the Faith’s house open, and he observed through the gate the defendant and Jamie begin to walk their dog, Maggie. As they passed by the vacant house where Lopez was hiding, Lopez quickly approached Jamie from behind and shot and killed him. Lopez advised that he shot Jamie three times in the head to “make sure he died quickly,” so the defendant and her daughter would not “have to see him suffer.” The shot to the groin was retaliation for the sexual abuse Lopez thought Jamie was inflicting upon the defendant. After killing Jamie, Lopez removed the wedding ring from Jamie’s finger and took it with him.⁸

After killing Jamie, Lopez got back into his pickup truck and returned to Tennessee. During the drive home, Lopez threw Jamie’s wedding ring out of the truck

⁸ While Lopez was removing the wedding ring, Jamie’s blood was transferred from his body to the slide of the .45 caliber handgun.

window “somewhere in Arkansas.” The few seconds it took to shoot Jamie was the only time Lopez and the defendant have been physically together at the same location in over twenty-five years. Lopez advised that in his time as a special operations soldier he took part in many covert missions in Iraq. Lopez said he was trained to “compartmentalize” the events that occurred during the missions and never speak of them again. Lopez described the murder of Jamie Faith as a “rescue mission” and advised that he and the defendant “never spoke of [Jamie’s murder] again.”

Four days after the murder of her husband, the defendant used her cell phone to create a group text that included over twenty of her “closest friends and neighbors.” In her first text message to the group, the defendant wrote the following: “Hello everyone. I wanted to start this group thread as you are all the closest friends or neighbors to Jamie and/or I. I plan to use this group thread to send you daily updates on the case, how Amber and I are doing, etc. I am obviously not going to share super detailed info on the case that might jeopardize it, but I will be sharing more information than what will be released to the public. Detectives came to see me today. Finally. In a nutshell, they don’t have much, but are running down leads. Still no plate on the truck but identifying more surveillance video and hoping they can get it. There was another witness today who said they saw the man pulling the gun on me and trying to pull the trigger repeatedly, but the gun was empty. Thank God.” Among the friends and neighbors included in the defendant’s group text was the man that killed her husband. The defendant included Darrin Lopez in the group text messages so that he too would be receiving “daily updates” as to the status of

the murder investigation.

Following Jamie's murder, the defendant was also directly communicating with Lopez outside of the "friends and neighbors" group texts. Lopez and the defendant remained in almost constant contact with each other on cell phones. Routinely engaging in phone sex (*See Attachment U*), discussing their desire to take part in the BDMS lifestyle (*See Attachment V*) and making plans to rent a house together in Tennessee (*See Attachment W*).⁹

Life Insurance/GoFundMe Account

On November 11, 2020, the defendant initiated a claim form with Metropolitan Life Insurance Company seeking approximately \$629,000 in death benefits. The defendant also began taking steps to acquire almost \$400,000 Jamie had in his retirement account at American Airlines. On multiple occasions, the defendant sent text messages to Lopez keeping him updated as to the status of the life insurance claim and her attempts to get the retirement funds (*See Attachment X*).

Approximately one month after Jamie's murder, the defendant provided Lopez with two credit cards in her name. She told Lopez that one of the cards had no limit and the other had a limit of \$35,000. The defendant encouraged Lopez, the man that executed her husband in front of her, "to use [the credit cards]" any time he wanted and that she would pay off the balances each month so Lopez "never needs to worry about [the cards]

⁹ Following her husband's murder, the defendant sent hundreds of text messages to Lopez telling him how much she loved him and how "amazing" they are together. The defendant sent these messages despite not having seen Lopez in person in over twenty-five years.

being declined” (*See Attachment Y*).

The day after Jamie’s murder, friends of the Faith family created a GoFundMe crowdfunding account (“Support for Jennifer Faith”) to provide financial assistance to the defendant and her daughter (*See Attachment Z*). The defendant was named the beneficiary of the account. Beginning on October 13, 2020, and continuing until December 3, 2020, the defendant withdrew approximately \$58,000 from the fund. In addition to the GoFundMe funds, the defendant also received direct donations from friends.¹⁰ The defendant used the donated funds to pay the monthly balance of the two credit cards she had provided to Lopez after Jamie’s murder. The defendant also used funds from the GoFundMe account to buy gifts for Lopez including a Samsung Q LED large screen television (*See Attachment aa*) and airline tickets for Lopez and his daughters to travel to Arizona in March 2021. The defendant did not use the funds to pay for her husband’s funeral expenses. A balance of \$6500 remains outstanding.

Obstruction of Justice

Following the murder of Jamie Faith, Dallas homicide detectives and ATF agents began trying to identify possible suspects. The defendant was interviewed by a Dallas homicide detective multiple times during the investigation. Despite cell phone records showing thousands of text messages between the defendant’s cell phone and Lopez’s cell phone occurring between April and October 2020, all (SMS) text messages between the

¹⁰ One of Jamie Faith’s closest friends gave the defendant a personal check in the amount of \$5000 days after Jamie’s murder.

defendant and Lopez had been deleted off of the defendant's cell phone when she was initially interviewed by detectives the day of her husband's murder.

When homicide detectives met with the defendant, she was asked about possible suspects that might have a reason to want to hurt Jamie. She never mentioned Darrin Lopez or the "emotional affair" she was having with him. She did, however, provide the names of other people she said could have possibly been involved in the murder. She provided the names despite knowing that Lopez was the real killer and that the names of the people she was sharing with detectives were in no way involved in Jamie's murder.

The defendant enjoyed the notoriety and media attention that she received as a result of her husband's murder. She was interviewed by multiple television news stations following Jamie's death. The defendant's persona in private was very different from the grieving widow she portrayed in public through the media. For example, during an interview with KXAS-NBC (Channel 5), she was asked by a reporter to sit in a rocking chair on her porch and look at a "Jamie Faith Memory Book" that contained numerous photographs of her husband. The image was to be used in part of the news coverage detailing Jamie's murder (*See Attachment bb*). During the interview, the defendant cried and begged the public to help identify the person responsible for killing her husband. Following the interview, Darrin Lopez sent a text message to the defendant and asked how the interview went ("How did it go?"). The defendant responded with a text message that read, "Mediocre. The reporter sucked, but I did fine. He insisted having me look at a stupid photo book of Jamie at the end. Barf" (*See Attachment cc*).

On December 2, 2020, the defendant was interviewed by WFAA-ABC (Channel 8). While being interviewed by the reporter, the defendant stood in the exact location where her husband had been gunned down less than two months before (*See Attachment dd*). During the interview, the defendant referred to the black truck used by her husband's killer to flee the location. The defendant said: "The truck is absolutely critical. Somebody has got to know whose truck this is. Because it is a black Nissan Titan extended cab. It had a Texas Rangers ("T") sticker in the back window. It was very distinctive from that point. There has got to be somebody who knows somebody that has that truck." Two days after the interview aired on local television, the defendant sent a text message to Lopez telling him to "take the sticker out of the back window of the truck." When Lopez sent a text message to the defendant telling her that he had removed the "T" sticker/decal as she requested, the defendant responded "Ok good. I love you too. So much. I don't want to be a pain about all of it.... just want you to be safe and I never want to lose you. Now life insurance is waiting on the detective as well" (*See Attachment ee*).

On January 6, 2021, a United States Magistrate Judge in the Middle District of Tennessee signed a search warrant authorizing the search of Lopez's residence in Cumberland Furnace, Tennessee. Dallas County also issued a murder warrant for Lopez's arrest. The execution of the search warrant and the arrest of Lopez was scheduled to occur on January 11, 2021.

On January 10, 2021, a Dallas homicide detective contacted the defendant and asked her if she could come to Dallas police headquarters to be interviewed the following

day. After agreeing to meet with the detective, the defendant texted Lopez and advised him “the detective called. He wants me in for interview.” She shared with Lopez that she was “a ball of nerves now.” Lopez replied “You don’t need to be.... just keep saying what you have been you will be fine” (*See Attachment ff*).

The defendant instructed Lopez not to text her the following day because she was going to “factory reset my phone after deleting texts.” The defendant told Lopez that she would pass along any updates to him as far as how the interview went through the “friends and neighbors” group text. She also instructed Lopez what he needed to tell law enforcement agents in the event “they pulled phone records” and asked Lopez about her. In a text message sent weeks earlier, the defendant reminded Lopez that if he was ever questioned by detectives, to tell them the defendant’s relationship with Jamie “was good” (*See Attachment gg*). She did this because she knew that the physical and sexual abuse that Lopez believed had occurred was a lie. The defendant feared that if Lopez made the police aware of the abuse allegations, an investigation would reveal what is now known.

Lopez was arrested in Tennessee on January 11, 2021. As Lopez was being taken into custody, ATF agents seized the cell phone he had in his vehicle, credit cards in the name of the defendant and the mask Lopez was wearing when he killed Jamie Faith. The .45 caliber handgun used to kill Jamie was recovered in the living room of Lopez’s home. While in custody, Lopez’s cell phone received one final text message from the defendant asking, “everything ok?”

Following Lopez’s arrest, a Dallas homicide detective contacted the defendant and

told her that Darrin Lopez had been arrested in Tennessee and charged with her husband's murder. The defendant was shown a photograph of Lopez in custody. Shortly after being made aware of Lopez's arrest, the defendant began transferring large amounts of money out of her bank account. On January 13, 2021, she transferred \$45,000 from her account into her daughter's account. On January 15, 2021, she transferred another \$8,000. On January 26, 2021, an additional \$65,000 was transferred. The defendant also began using one of Lopez's relatives to communicate with Lopez while he was in custody. The defendant's attempts to communicate with Lopez were designed to continue to manipulate him and keep Lopez from talking to law enforcement officers.

In a text message sent shortly after Lopez's arrest, the defendant told Lopez's relative that she hopes Lopez "knows not to say a word to anyone without a lawyer" (*See Attachment hh*). The defendant instructed the relative to tell him "3-8-1" and that Lopez should know the meaning because the defendant used to send him that in notes they passed in high school. In a subsequent text message, the defendant used her cell phone to relay a message to Lopez that read: "I hate to ask this, but I don't know what else to do. I need to let Darrin know I am with him, will always be with him, regardless of whatever has happened. I've just needed to be cautious because every communication is being monitored. Can you please pass along that message. I tried tonight after getting super drunk, but I am sure he doesn't believe it was me. Please tell him ASAP I will always be his" (*See Attachment ii*).¹¹

¹¹ While in custody, Darrin Lopez replied to the defendant's messages through his relative. His message read

Jamie is survived by his mother and father who live in Nevada. His sister resides in California. Jamie's violent murder has greatly impacted the Faith family. Following the defendant's arrest in February 2021, she began a letter writing campaign from jail targeting Jamie's mother and others. The defendant used jailhouse letters to lie to, deceive and manipulate Jamie's family into believing she was not involved in his murder when in fact she was. In multiple letters to Jamie's parents, the defendant wrote that she "looks forward to hearing from you" and "I love you both dearly."¹²

In a letter dated March 30, 2021, the defendant shared with Jamie's mother how much she "is missing Jamie" and wrote about "messages" that Jamie was sending to her in jail. She described a "dream" she had where "Jamie was lying beside her" in the jail cell. The defendant wrote that Jamie told her in a dream that "he wasn't able to stay" with her and "watch over her anymore and that he needed to move on." The defendant told Jamie's mother that she "kissed" Jamie and told him "It's ok to go, I love you" (*See Attachment jj*). In other letters the defendant repeatedly lied to Jamie's mother by professing her innocence and she accused the government and law enforcement officers of misrepresenting facts --- the same facts she has admitted to the Court are true.

In a letter mailed in October 2021, written within days of her signing her Factual

"Thank you for sending me messages hearing from you gives me strength. You will always be cherished. I do know how you feel, together we can get through this. I believe in my heart. Please stay strong for US. Your Knight always.....As You Wish." The government has learned that the defendant, while in federal custody, continues to try to contact Lopez's relative in Tennessee, presumably to pass messages to Lopez. The defendant contacted the relative as recently as the week of March 15, 2022.

¹² In text message communications between the defendant and Darrin Lopez, the defendant characterized her feelings toward Jamie's mother very differently. On September 18, 2020, three weeks before Jamie's murder, the defendant referred to Jamie's mother as a bitch ("Yeah, she's a bitch") and said, "I can't handle her sober."

Resume where she admitted to her role in her husband's murder, the defendant wrote to Jamie's mother that she "had no idea" that Darrin Lopez was involved in the murder of her son. The defendant wrote that she had "never sent Darrin emails from any email account but my own" and that she would "never do anything that would cause [Jamie] physical harm in any way." The defendant described her husband as "nothing but an amazing husband.... and father to Amber" The defendant reassured Jamie's mother that "Jamie knows the truth, I know the truth, and God knows the truth." (See Attachment kk).

The defendant also used her time in custody to communicate with her daughter, Amber. In recorded jail calls, the defendant characterized the case against her as "bullshit" and the defendant surmised that she was arrested only because she is a female who had an affair and "lives in Texas." In a separate recorded jail call, the defendant told her daughter that she did nothing wrong and that her daughter should not "believe the twisted shit that [the government] does because they do it in all of their cases."

On October 22, 2021, the defendant signed plea paperwork advising the Court and the government of her intention to plead guilty to Count One of the superseding indictment (Murder-For-Hire). In a letter dated October 25, 2021, the defendant instructed her daughter to set aside "\$200,000" from the funds Amber would be receiving from retirement accounts and the sale of the Faith's home. The defendant estimated that \$200,000 is the amount of money she would need for her prison commissary and telephone account after she pleads guilty and is sentenced by the Court.

The defendant entered a guilty plea to Count One of the superseding indictment on

February 7, 2022. During the rearraignment hearing, while under oath, the Court asked the defendant multiple times if she committed each of the acts detailed in her Factual Resume. Those acts include creating two fake Gmail accounts and using the fake accounts to make false allegations of physical and sexual abuse against her husband. She was also asked if as consideration for anything of value, she caused Darrin Lopez to travel across state lines to kill her husband. The defendant admitted under oath she committed each of the acts described in her Factual Resume, that she and her attorneys had signed the document and that she had initialed each paragraph within the document.

Two days before her guilty plea and months after she signed her Factual Resume admitting to her role in the murder of her husband, the defendant wrote a letter to her father professing her innocence. As with numerous other letters, text messages and emails the defendant has written, the letter sent to her father contained multiple lies. For example, the defendant wrote that in “October 2020, [Darrin Lopez] drove from TN and shot and killed my husband, Jamie, and assaulted me. There have been a lot of things published in the media; things the prosecutor has leaked, but much of it is so twisted and taken out of context, it paints a damning picture and has resulted in a false charge of Murder-For-Hire against me.” She goes on to say that the “charge is not true at all” but that she has “decided to plead guilty anyway.” The defendant expressed how “baffling” it is that her friends have “cut all ties with me” and she concluded the letter by asking her father if he “would like to help [her] financially, I could use some money on my commissary account.”

The Defendant's Conduct Merits a Sentence of Life in Prison
Under the 18 U.S.C. § 3553(a) Factors

As the Supreme Court explained in *Gall v. United States*, 128 S.Ct. 586, 596-97 (2007), the district court should begin all sentencing proceedings by correctly calculating the applicable Guideline range. The Court must then consider all of the factors in 18 U.S.C. § 3553(a) to determine whether they support the requested sentence and impose a sentence that is “sufficient, but not greater than necessary.” *United States v. Smith*, 440 F.3d 704, 707 (5th Cir. 2006).

A. Nature and Circumstances of the Offense

The seriousness of the crime committed in this case cannot be overstated. The defendant’s conduct, both before and after her husband’s murder was extraordinarily heinous and cruel. When the defendant and Jamie Faith exited their residence to walk their dog on the morning of October 9, 2020, the defendant knew that only she would be returning alive. The one person that Jamie Faith loved and trusted more than any other, led him to his death.

The murder of Jamie Faith was not an impulsive act. It was the culmination of months of manipulation and deception by the defendant. The defendant’s plot to have her husband killed was fueled by her desire for a new life with her high school sweetheart, Darrin Lopez. The defendant exploited Darrin Lopez’s disability and drove him to travel over 1300 miles to brutally murder a man that he had never met. But for the actions of the defendant, Darrin Lopez would not have killed Jamie Faith.

Between March and October 2020, Jamie had his trust, his identity, his privacy and ultimately his life taken from him. The person closest to Jamie, who publicly professed her love for him, privately assumed his identity and falsely portrayed him as a rapist and a serial abuser. The defendant stole her best friend's identity and used his name to facilitate her husband's murder. In the weeks preceding his death, Jamie was electronically stalked and ultimately gunned down on a public sidewalk steps from his home. Every betrayal begins with trust. Jamie Faith made the mistake of trusting the defendant and he paid for that mistake with his life.

B. Characteristics of the Defendant

After Jamie's murder, the defendant's pattern of manipulation continued. She exploited the kindness and generosity of others that sought to help her. She took thousands of dollars donated as a result of Jamie's murder and used it to not only enrich herself, but also reward her husband's killer. She sought to collect over \$1 million in life insurance benefits and retirement funds so that she could maintain the lifestyle she had grown accustomed to. A lifestyle she knew that Lopez could not provide on his own.

The defendant lied to and betrayed her husband. A man that for fifteen years had shown the defendant and her daughter kindness, generosity, and love. The defendant lied to and tricked Darrin Lopez into believing that she was being physically and sexually abused when she was not. Darrin Lopez's three daughters no longer have their father in the home. The defendant lied to the media, and she continues to lie to her friends and family. The defendant lied to and misled law enforcement agents and made repeated

attempts to corruptly obstruct justice and impede the state and federal investigations into her husband's death.

The defendant's arrest in this case did not stop her lies and abhorrent behavior. It continued from a jail cell. Even Jamie's elderly mother and father, who are grieving the violent death of their son, became targets of the defendant's manipulation. The defendant has expressed no real remorse for her actions and despite her guilty plea and the overwhelming evidence supporting it, she remarkably continues to hold herself out to others as some kind of a victim. The defendant has minimized the substantial role she played in the death of her husband. In the defendant's words and actions, there has been no recognition that she did anything wrong or should have done anything differently. While it is true that Darrin Lopez pulled the trigger on October 9, 2020, it is equally true that the defendant is a cold-blooded murderer.

Conclusion

In light of the foregoing, it is respectfully requested that the defendant be sentenced to spend the rest of her life in prison. A term of life imprisonment is reasonable and appropriate given the severity of the defendant's criminal conduct. The Court would be hard pressed to find a defendant more deserving of such a sentence.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2022, I electronically filed the foregoing document with the clerk for the United States District Court for the Northern District of Texas pursuant to its electronic filing system (ECF). The ECF sent a "Notice of Electronic Filing" to the attorneys of record who have consented to accepting service via this method.

Rick Calvert

Rick Calvert
Assistant United States Attorney